REMARKS

I. INTRODUCTION

The Office Action of February 15, 2002 and the references cited therein have been carefully studied and, in view of the following representations and foregoing amendments, reconsideration and allowance of this application are most respectfully requested. Claims 65 and 70-94 are pending in this application. The Examiner has rejected claims 65 and 70-94. By this amendment, claims 65 and 81 have been amended. Applicants believe that the claims are now in condition for allowance.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached page is captioned "**Version with Markings to Show Changes Made**."

II. CLAIM REJECTIONS - 35 U.S.C. § 103, CLAIMS 65 & 70-80

Claims 65 and 70-80 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,294,870 ("Tang et al.") in view of U.S. Patent No. 5,609,943 ("DeKoven et al."). The Examiner has alleged that "it would have been obvious for one having ordinary skill in this art at the time the invention was made to substitute the printing method of the secondary reference for the printing method of the primary reference." Applicants respectfully traverse this rejection.

Independent claims 65 and 81 have been amended herein to better clarify the scope of the present invention. Specifically, these claims have been amended to indicate that

the ink is deposited by ink jet printing directly onto the substrate. No new matter has been added herein, as support for these amendments can be found in the specification at, *inter alia*, page 7, lines 14-18; page 8, lines 22-26; page 12, line 36 to page 13, line 1; page 13, lines 27-28; page 14, line 34 to page 15, line 3; and Figures 1 & 2. Dependent claims 70-80 and 82-94 all depend, either directly or indirectly, from independent claims 65 and 81, and thus include this claim limitation as well.

Tang et al. discloses an "organic electroluminescent multicolor image display device ... containing an image display array made up of a plurality of light emitting pixels arranged in intersecting files (rows and columns)." Tang et al., abstract. As admitted by the Examiner on page 2 of the Office Action mailed on February 15, 2002, Tang et al. "does not disclose that the pixels may be provided by ink jet printing."

Although the Examiner alleges that DeKoven et al. discloses "that the formation of color containing pixels by ink jet printing is well known in the prior art," Applicants respectfully disagree. DeKoven et al. discloses a "dispersion-preventing patterned substrate suitable for a liquid crystal display device." DeKoven et al., abstract. Specifically, DeKoven et al. discloses a non-wettable resin patterned on a transparent substrate, where the resin is a cure of a coating composition, and the coating composition comprises a crosslinkable polymeric surfactant and a crosslinking agent. *Id.* at col. 1, line 55 to col. 2, line 5. According to DeKoven et al., the crosslinkable coating composition can be patterned on the substrate by printing, including gravure, screen offset, flexographic, and ink jet printing. *Id.* at col. 4, lines 44-51. The pattern of the coating composition then "defines a

plurality of wells adapted to receive a coloring agent." *Id.* at col. 2,lines 4-5. Thus, DeKoven et al. teaches ink jet printing of a patterned coating composition onto a substrate to form a pattern of wells on which a coloring agent is deposited. The coloring agent is not deposited via ink jet printing, and it is deposited onto the patterned non-wettable resin, not the substrate.

In contrast to the teaching of DeKoven et al., the method of the present invention, as currently recited in independent claim 65 in amended form, includes the claim limitation of "depositing ink, by ink jet printing, directly onto said substrate." As discussed in the specification, the method of the present invention, by depositing the ink via ink jet printing directly onto a substrate, provides for a relatively cheap deposition technique with a high degree of resolution over either a very large or small area. *See* specification, page 2, lines 1-6. On the other hand, as discussed above, the method disclosed in DeKoven et al. is directed to ink jet printing of a patterned coating composition onto a substrate to form a pattern of wells on which a coloring agent is deposited. There is no teaching nor suggestion in DeKoven et al. to deposit ink directly onto a substrate via ink jet printing, as the coloring agent is not deposited via ink jet printing, and it is deposited onto the patterned non-wettable resin as opposed to the substrate. Thus, it is respectfully submitted that the rejection under 35 U.S.C. § 103(a) has been overcome, and should therefore be withdrawn.

III. CLAIM REJECTIONS - 35 U.S.C. § 102, CLAIM 81

Claim 81 stands rejected under 35 U.S.C. §102(a) as being anticipated by DeKoven et al. The Examiner has alleged that DeKoven et al. discloses a "method of

applying an ink comprising a pigment and a polymeric material to a transparent substrate by ink jet printing." Applicants respectfully traverse this rejection.

As described above, independent claim 81 has been amended herein to better clarify the scope of the present invention. Specifically, this claim has been amended to indicate that the ink is deposited by ink jet printing directly onto the substrate. Dependent claims 82-94 all depend, either directly or indirectly, from independent claim 81, and thus include this claim limitation as well.

As also discussed above, the method disclosed in DeKoven et al. is directed to ink jet printing of a patterned coating composition onto a substrate to form a pattern of wells on which a coloring agent is deposited. There is no teaching nor suggestion in DeKoven et al. to deposit ink directly onto a substrate via ink jet printing, as the coloring agent is not deposited via ink jet printing, and it is deposited onto the patterned non-wettable resin as opposed to the substrate. Thus, DeKoven et al. does not disclose nor suggest all of the claim limitations of independent claim 81, and thus it is respectfully submitted that the rejection under 35 U.S.C. § 102(a) has been overcome, and should therefore be withdrawn.

IV. CLAIM REJECTIONS - 35 U.S.C. § 103, CLAIMS 82-94

Claims 82-94 stand rejected under 35 U.S.C. §103(a) as being unpatentable over DeKoven et al. for the same reasons as claim 81 was rejected over DeKoven et al. Applicants respectfully traverse this rejection.

Dependent claims 82-94 all depend, either directly or indirectly, from independent claim 81, and thus include the claim limitation that the ink is deposited by ink jet printing directly onto the substrate. Thus, for the same reasons as discussed above regarding the rejection of claim 81 over DeKoven et al., Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) has been overcome, and should therefore be withdrawn.

V. CONCLUSION

Applicants respectfully submit that the pending claims are in condition for allowance and request that such action be taken. If for any reason the Examiner believes that prosecution of this application would be advanced by contact with the Applicants' attorney, the Examiner is invited to contact the undersigned at the telephone number given below.

Respectfully submitted,

Dated: July 15, 2002

By: _____

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims:

Claims 65 and 81 have been amended as follows:

65. (Amended) A method for creating a display device comprising

providing a transparent substrate; and

depositing ink, by ink jet printing, directly onto ~~over~~ said substrate,

wherein said ink is deposited directly onto ~~over~~ said substrate in a pattern forming red, green and blue light emitting regions, and

wherein said red, green and blue light emitting regions are arranged in pixels.

81. (Amended) A method for constructing a display device comprising

ink jet printing a liquid ink directly onto a substrate in a specified pattern wherein the liquid ink comprises a liquid carrier medium and a polymeric material.